1 Pursuant to the Discovery Management Order No.10 (Dkt. 1157), as extended by 2 stipulation and order entered on September 19, 2024 (Dkt. 1163), and the September 25, 2024 3 Joint Status Report (ECF 1176), the Bellwether School District Plaintiffs ("SD Plaintiffs") and 4 Defendants (collectively, "the Parties") jointly submit this status report on search term 5 negotiations and Plaintiffs' obligations under the Family Educational Rights and Privacy Act 6 ("FERPA"). 7 Since the last status report, the Parties have continued to meet and confer regarding search 8 terms, including conferring regarding the results of responsiveness sampling in an effort to further 9 narrow remaining disputes. With respect to Plaintiffs' obligations under FERPA, the Parties have 10 exchanged drafts and are close to agreement on a joint stipulation and proposed modification to 11 the Stipulated Second Modified Protective Order (Dkt. No. 665). 12 The Parties will continue to meet and confer to see if they can further narrow or resolve any 13 remaining disputes. Should the Parties be unable to reach a complete resolution of their differences, 14 on October 10, 2024, the Parties will submit a joint letter brief in compliance with Section H(3) of the 15 Court's discovery standing order. SD Plaintiffs reserve their right to seek a commensurate extension of time to the November 5, 2024, substantial completion of document production for 16 17 those documents that hit on any additional terms. 18 DATED: October 2, 2024 Respectfully submitted, 19 /s Lexi J. Hazam LEXI J. HAZAM 20 LIEFF CABRASER HEIMANN & BERNSTEIN, LLP 21 275 BATTERY STREET, 29TH FLOOR SAN FRANCISCO, CA 94111-3339 22 Telephone: 415-956-1000 lhazam@lchb.com 23 PREVIN WARREN 24 **MOTLEY RICE LLC** 401 9th Street NW Suite 630 25 Washington DC 20004 Telephone: 202-386-9610 26 pwarren@motleyrice.com 27 Co-Lead Counsel

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